

Robert Yaquinto, Jr.
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ATTORNEY FOR TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	
PREMISE MEDIA HOLDINGS, LP	§	CASE NO. 09-38751-BJH-7
	§	
DEBTOR	§	

MOTION TO EXPEDITE HEARINGS

TO THE HONORABLE BARBARA J. HOUSER, U.S. BANKRUPTCY JUDGE:

Robert Yaquinto, Jr., Trustee, in the above bankruptcy proceeding, files this motion to expedite hearings, and respectfully shows the Court as follows:

1. **PREMISE MEDIA HOLDINGS, LP**. (“Debtor”) filed its petition for bankruptcy under Chapter 7 of Title 11 of the United States Bankruptcy Code on December 29, 2009. Robert Yaquinto, Jr. was subsequently appointed Trustee of the estate.

2. Trustee desires to expedite the hearing on **MOTION TO SELL THE MOTION PICTURE ENTITLED *EXPULSED: NO INTELLIGENCE ALLOWED* AND OTHER RELATED PERSONAL PROPERTY OF ESTATE FREE AND CLEAR OF LIENS AND ENCUMBRANCES** because the auction of the property is scheduled to start on June 23, 2011 and end on June 28, 2011 at 10:00 a.m., at 2323 Langford, Dallas, TX 75208.

WHEREFORE, Robert Yaquinto, Jr., Trustee, requests that this Court enter its Order to Expedite Hearing on **MOTION TO SELL THE MOTION PICTURE ENTITLED *EXPULSED: NO INTELLIGENCE ALLOWED AND OTHER RELATED PERSONAL PROPERTY OF ESTATE FREE AND CLEAR OF LIENS AND ENCUMBRANCES*** to twenty (20) days for responses or objections to Trustee's Motion to Sell Property of Estate Free and Clear of Liens and Encumbrances; and to Expedite Hearing on the Motion; and for such other and further relief to which he may show himself justly entitled.

Respectfully submitted,

/s/ Robert Yaquinto, Jr.
Robert Yaquinto, Jr.
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ATTORNEY FOR TRUSTEE

CERTIFICATE OF CONFERENCE

I certify that I called and left a voice message for and I have emailed a request to Mary Fran Durham, staff attorney with the Office of the U.S. Trustee to discuss this Motion to Expedite Hearing on Trustee's Motion to Sell Property of Estate Free and Clear of Liens and Encumbrances. She was not available, so this motion is presented to the Court for consideration.

/s/ Robert Yaquinto, Jr.
Robert Yaquinto, Jr.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the *Motion to Expedite* has been forwarded by electronic transmission or first class mail, postage prepaid, to those parties included on the attached Service List, on this 1st day of June, 2011.

/s/ Robert Yaquinto, Jr.
Robert Yaquinto, Jr.

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